

Scott Freeman MD et al. v. Stephen Hurst et al.

2:22-cv-1433-RFB-MDC

Stipulation and Order to Extend Briefing Schedule

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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 SCOTT FREEMAN MD, individually and as
trustee for the SCOTT MITCHELL FREEMAN
13 REVOCABLE LIVING TRUST, dated March 10,
2012, for itself and as assignee of FERDINAND
14 BELGA,

15 Plaintiff,

16 *v.*

17 STEPHEN HURST; NICO FORTE; CERUVIA
LIFESCIENCES f/k/a CH TAC, LLC f/k/a
18 SAVANT TAC, LLC; CAREY TURNBULL;
19 RUSSELL BURBANK; BPM LLP; SAVANT
HWP, INC.; SAVANT HWP HOLDINGS, LLC;
20 and SAVANT ADDICTION MEDICINE, LLC,

21 Defendants,

22 *and*

23 SAVANT ADDICTION MEDICINE, LLC;
SAVANT HWP HOLDINGS, LLC; and SAVANT
24 HWP, INC.,

25 Nominal Defendants.

Case No. 2:22-cv-1433-RFB-MDC

**Stipulation and Order to Extend
Briefing Schedules**

Scott Freeman MD et al. v. Stephen Hurst et al.
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1 **WHEREAS**, the Court previously extended the time to August 2, 2024 for
2 Defendants to answer or otherwise respond to Plaintiff's Third Amended Complaint. *See*
3 ECF No. 196.

4 **WHEREAS**, on July 31, 2024, Defendants Stephen Hurst and Savant HWP, Inc.
5 filed a motion to disqualify Plaintiff's counsel, to which a response is due on
6 August 14, 2024. *See* ECF No. 201.

7 **WHEREAS**, on August 1, 2024, Defendant Nico Forte filed a partial motion to
8 dismiss, or alternatively, to strike the Third Amended Complaint. *See* ECF No. 202.

9 **WHEREAS**, on August 2, 2024, Defendants Nico Forte, Savant HWP, Inc., and
10 Stephen Hurst answered and alleged counterclaims against Plaintiff. *See* ECF No. 203.

11 **WHEREAS**, on August 2, 2024, Defendants Ceruvia Lifesciences and Carey
12 Turnball filed a motion to dismiss. *See* ECF No. 204.

13 **WHEREAS**, the undersigned parties are engaged in active settlement negotiations
14 to fully resolve all claims and defenses and desire to conserve resources during said
15 negotiations.

16 The undersigned parties therefore present the following proposed schedule.¹

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25 ¹ This proposed briefing schedule does not modify the deadline for Plaintiff to respond to
Defendants Russel Burbank and BPM LLP's motion to dismiss (ECF No. 199).

Scott Freeman MD et al. v. Stephen Hurst et al.

2:22-cv-1433-RFB-MDC

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1 **IT IS HEREBY STIPULATED AND AGREED**, by and between the
 2 undersigned parties, by and through their respective counsel of record, that they will adhere
 3 to the revised briefing schedule set forth below:

4 Event	Current Date	New Date
5 Answer or Response to 6 Third Amended 7 Complaint for 8 Savant LLCs	August 2, 2024	Friday, September 20, 2024
9 Opposition to Motion 10 to Disqualify	August 14, 2024	Friday, September 27, 2024
11 Opposition to Nico 12 Forte's Motion to 13 Dismiss	August 15, 2024	Friday, September 27, 2024
14 Opposition to Ceruvia 15 and Turnball's Motion 16 to Dismiss	August 16, 2024	Friday, September 27, 2024
17 Response or Answer to 18 Savant, Hurst, and 19 Forte's Counterclaim	August 23, 2024	Friday, October 4, 2024

20 **IT IS FURTHER STIPULATED AND AGREED**, by and between the
 21 undersigned parties, and through their respective counsel of record, that any reply briefs
 22 associated with the extended deadlines will be filed in the normal course.
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Respectfully submitted this 5th day of August 2024.

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Scott Freeman MD et al. v. Stephen Hurst et al.
2:22-cv-1433-RFB-MDC
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Order

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE,
UNITED STATES MAGISTRATE JUDGE

Dated: 8/8/2024

Case No.: 2:22-cv-01433-RFB-MDC

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of August 2024, a true and correct copy of the foregoing **Stipulation and Order to Extend Briefing Schedules** was served by the following method(s):

☒ **Electronic:** by submitting electronically for filing and/or service with the United States District Court District of Nevada's e-filing system and served on counsel electronically in accordance with the E-service list to the following email addresses:

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